

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor

Case No.

19-34574-KRH

Chapter

7

**NOTICE OF MOTION AND HEARING THEREON IF NECESSARY**

PLEASE TAKE NOTICE<sup>2</sup> Lynn L. Tavenner, Trustee, and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, in the above-referenced Chapter 7 case (the “**Case**”), by counsel, filed her *Trustee’s Motion for an Order Establishing Procedures Regarding the Prosecution of Actions Involving Former Attorneys and Certain Others and Memorandum in Support Thereof* (the “**Motion**”). A copy of the Motion may be obtained by written request to dtabakin@tb-lawfirm.com.

**PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion carefully and discuss them with your attorney, if you have one in this Chapter 7 Case. (If you do not have an attorney, you may wish to consult one).**

**PLEASE TAKE FURTHER NOTICE** on September 4, 2019, the Court entered the *Order Establishing Certain Notice, Case Management and Administrative Procedures* [ECF. No. 38] (the “**Case Management Order**”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “**Case Management Procedures**”). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

<sup>2</sup> **Receipt of this notice does not mean you have been identified as a defendant; rather, the Trustee is investigating facts related to transactions that may have included you, and she will, after the completion of said investigation, make demand where appropriate.**

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*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

to request to [dtabakin@tb-lawfirm.com](mailto:dtabakin@tb-lawfirm.com) or, for a fee, at <https://ecf.vaeb.uscourts.gov>.

**PLEASE TAKE FURTHER NOTICE** if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then, by **May 25, 2020** (the “**Objection Deadline**”), you or your attorney must:

File with the Court, either electronically or at the address shown below, a written response to the Motion pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the Objection Deadline.

**If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion as conceded and enter an appropriate order granting the requested relief without further notice or hearing.**

Clerk of the Court  
United States Bankruptcy Court  
701 East Broad Street, Suite 4000  
Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection is received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT** the Court will entertain the Motion on May 28, 2020, at 11:00 a.m. (or such time thereafter as the matter may be heard). In connection with the same, the undersigned will appear, unless otherwise directed by the Court, telephonically pursuant to Standing Order 20-4 before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad Street Richmond, Virginia 23219. Any party desiring to object or otherwise be heard with respect to the same shall also appear and be heard at such time.

**PLEASE TAKE FURTHER NOTICE THAT** you should consult the Case Management Procedures before filing any written response.

**PLEASE GOVERN YOURSELVES ACCORDINGLY.**

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: May 14, 2020  
Richmond, Virginia

By: /s/ Paula S. Beran  
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*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

Pursuant to the Local Rules of this Court, I certify that on this 14th day of May 2020, a true copy of the foregoing Motion was sent electronically and/or by first-class mail to: (a) the Office of the United States Trustee; (b) parties who the Trustee is currently investigating to determine if said Person benefited from a transfer involving a FAO Action whose address the Trustee has been able to locate in the Debtor's books and records; (c) the Core Parties and 2002 List as defined in the *Order Establishing Certain Notice, Case Management, and Administrative Procedures*, ECF No. 38; and (d) all parties that properly filed a request for notice of papers in this case pursuant to Bankruptcy Rule 2002 (as indicated on the service list maintained at the office of Tavenner & Beran, PLC).

/s/ Paula S. Beran  
*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*